Boiler Group Chair/Co-Chair

ICCR Boiler Source Work Group

Attached is a table entitled <u>HAPs Selection and Test Methods for Digester gas Fired Boilers.</u> The list contains the names of the 189 Hazardous Air Pollutants (HAPs) that have, based on experience, been screened for potential presence in emissions from digester gas fired boilers. This preliminary screening has been performed on the list by the Testing and Monitoring Protocol Work Group (TMPWG). This table is being forwarded to the Boiler Source Work Group (SWG) for review and comment.

The table includes HAPs that may be present in these emissions. Additionally, a listing of testing methods that have been used and have the potential to quantify the HAPs presence in flue gas emissions are included.

For those HAPs that are not included in the list, a codified reason for their exclusion is provided. Exclusion codes include:

- 1- Compound is not expected to be emitted from source because basic chemical or physical principles do not favor its existence in source exhaust.
- 2 Existing test data indicate that compound is not emitted in significant quantities from source.

Other exclusion codes are included as appropriate.

It should be noted that this table is general in its first draft and represents the extent of the TMPWG's knowledge and experience with emissions from digester gas fired boilers. Please review carefully from a standpoint of those HAPs included as well as those HAPs excluded. The subgroup within the TMPWG that is responsible for the development of this table has included a preface that provides the sources of information utilized to develop the table, the rationale for exclusion codes, and the names of the TMPWG contact for the Boiler SWG.

If we can be of service in any other fashion or if you have any questions concerning in the table, please contact Tom McGrath (e-mail: "eertommc@hotmail.com") the TMPWG member who is monitoring the activities of your SWG.

Rationale for Compound Selection for Reduced Hazardous Air Pollutant (HAP) List

Source Category: Boilers (Digester gas fired)

A. Source of information used in the development of reduced HAP list table

The attached target list of 22 HAPs was prepared based on: 1) California experience with toxic air regulations such as AB 2588 and, 2) survey done by EPA and Association of Metropolitan Sewerage Agencies (AMSA). These two approaches are briefly described in the following.

1. In California, the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) was implemented on June 1, 1989. This law requires facilities with air toxic emissions to self report emissions in order to determine if "hot spots" exist in the state. Industry groups, public agencies and municipalities were required to submit air emission inventory reports as part of the program. To prepare a report in a cost-effective manner, a combination of methods was used.

To comply with the requirements of AB 2588 at wastewater treatment plants, for instance, the the City of Los Angeles (CLA) acquired consultant services to develop a reduced list of compounds for quantification and reporting purpose. AB 2588 requires quantification of over 150 compounds if they are emitted at a reporting facility in excess of "quantification threshold" in pounds per year. For preparing the reduced or "target list" of +16 compounds for the combustion sources, CLA used historical influent monitoring at the plant, data on VOC found from other Publicly Owned Treatment Works (POTWs), pooled emission estimation program (PEEP), and literature. In addition, ducted headworks were source tested for air and liquid samples collected at the plant influent.

Another source of information used to prepare the reduced HAP list based was based on the data derived from PEEP. PEEP was formed to pool source testing efforts in California as a part of compliance with AB 2588. This program entailed testing both gas and liquid streams and selected unit processes, developing process emission factors and then applying these factors to other similar processes. Sludge incinerators, headworks and chlorinator discharges were not included in the PEEP program. However, PEEP program recommended a list of 18 compounds for the analysis of exhaust gases from the combustion of the digester gas. The PEEP list differed from the CLA list by only four compounds.

2. The reduced list of HAPs at POTWs was also derived from the report produced by the combined efforts of EPA and AMSA. In April 1995, AMSA provided EPA with a target list of 26 compounds most likely to be found in POTW offgases. AMSA used following methodology of reducing the EPA proposed 108 compounds to 26 compounds based on: 1) compounds sampled for but never detected by POTWs responding to the 1994 National Influent Toxic survey, 2) compounds never samples for by POTWs and, AMSA strongly suspects that they are not present or present in insignificant concentrations and 3) compounds whose mass emission contribution to the total mass emissions from AMSA's model POTW using the 62 compounds detected by POTWs constituted less than one percent.

The AMSA/EPA short list was slightly amended from 26 to 29 by the addition of three compounds based upon EPA's and AMSA's review of Toxic Release Inventory (TRIS) database and AMSA's 1994 national survey.

B. Rationale for the exclusion codes and number of compounds included in the reduced HAP list table

Most industrial dischargers are regulated, and the released compound types and amount can therefore be determined. For POTWs, a reduced list of compounds was necessary considering the diversity of sources contributing wastewater to the facility. For preparation of such a list compounds were excluded based on following three exclusion codes:

- 1- Compound not expected to be emitted from source because because basic chemical or physical principles do not favor its existence in source exhaust.
- 2- Existing test data indicate that compound is not emitted in significant quantities from source.
- 3- Other
- 4- Compounds not expected to be emitted from POTW sources based on EPA/AMSA (1995) and PEEP (1990) target lists.

Following table summarizes the three reduced HAP lists by CLA, PEEP and AMSA/EPA mentioned above. These lists were used as rationale for preparation of the final reduced HAP list.

Compound List	Source	Comments	
16 compounds derived from AB 2588	CLA	For combustion sources	
18 compounds derived from AB 2588	PEEP	For combustion (except incinerators) sources	
29 compounds derived from CAAA's 189HAP list	AMSA/EPA	For noncombustion sources	

Six compounds (1,3-butadiene, 1,4-dioxane, styrene and o-, m-, and p-xylenes) were added to the CLA list of 16 to make the final HAP list of 22 compounds based on their likelihood of existing in most POTW emissions from combustion sources

3. References

a) City of Los Angeles, Department of Public Works, Bureau of Sanitation. (1991) Final Emissions Inventory Report, City of Los Angeles Air Toxics Program, AB 2588 - Air Toxics "Hot Spots" Information and Assessment Act of 1987, Hyperion Treatment Plant, Playa del Rey,

CA.

- b) Joint Power Agencies for Pooled Emission Estimation Program. (1990) Final Report for POTWs on Air Toxics "Hot Spots" Information and Assessment Act of 1987.
- c) U.S. Environmental Protection Agency, Emission Standards Division, Office of Air Quality and Standards. (June 8, 1995) Presumptive MACT for Publicly Owned Treatment Works (and references therein), Research Triangle Park, NC.

Please contact Farhana Mohamed for more information on the attached list by telephone at (310) 524-9180, FAX at (310) 524-8294 or by e-mail at fym@san.ci.la.ca.us

HAPS Selection	n and Test N	lethods for Source Categ	ory		
0		Dellare (discretes see fine	.A.		
Source Categor	ry:	Boilers (digester gas fire	d)		
Include in List	CAS No.	Chemical name	If excluded, give reason for exclusion (use codes where appropriate)	If Included, give applicable test method(s)	
х	75070	Acetaldehyde	(CARB 430	
		Acetamide	2,4		
		Acetonitrile Acetophenone	2,4 2,4		
			2,4		
х	107028	Acrolein		CARB 430	
		Acrylamide	2,4		
		Acrylic acid	2,4		
		Acrylonitrile Allyl chloride	2,4 2,4		
		4-Aminobiphenyl	2,4		
		Aniline	1,2,4		
		o-Anisidine	1,2,4		
		Asbestos	1,2,4	EDA TO 44/CADD 400	
X		Benzene Benzidine	2,4	EPA TO-14/CARB 422	
		Benzotrichloride	2,4		
		Benzyl chloride	2,4		
	92524	Biphenyl	2,4		
		Bis(2-ethylhexyl)phthalat			
			2,4 2,4		
x		1,3-Butadiene	۵,٦	EPA TO-14/CARB 422	
	156627	Calcium cyanamide	1,2,4		
	133062	Captan	2,4		
		Carbaryl	2,4		
х		Carbon disulfide Carbon tetrachloride	2	EPA TO-14/CARB 422	
^		Carbonyl sulfide	2,4	LITTO IT/ONIND TEE	
			2,4		
		Chloramben	2,4		
		Chlordane	2,4		
	7782505	Chlorine Chloroacetic acid	2,4 2,4		
			2,4		
		Chlorobenzene	2,4		
		Chlorobenzilate	1,2,4		
х		Chloroform		EPA TO-14/CARB 422	
		Chloromethyl methyl eth	2,4		
		Cresols/Cresylic acid (iso			
		o-Cresol	2,4		
			2,4		
		p-Cresol	2,4		
		Cumene 2,4-D, salts and esters	2,4		
	3547044		2,4		
		Diazomethane	2,4		
			2,4		
		1,2-Dibromo3-chloroprop			
х		Dibutylphthalate 1,4-Dichlorobenzene(p)	2,4	EPA TO-14/CARB 422	
X		1,4-Dioxane		EPA TO-14/CARB 422	
	91941	3,3-Dichlorobenzidene	1,2,4		
		Dichloroethyl ether (Bis(2			
		1,3-Dichloropropene Dichlorvos	2,4 1,2,4		
 		Diethanolamine	2,4		
		N,N-Diethyl aniline (N,N-			
	64675	Diethyl sulfate	2,4		
		3,3-Dimethoxybenzidine			
		Dimethyl aminoazobenzo 3,3Dimethyl benzidine			
 		Dimethyl carbamoyl chlo			
		Dimethyl formamide	2,4		
	57147	1,1-Dimethyl hydrazine	2,4		
			2,4		
		Dimethyl sulfate 4,6-Dinitroo-cresol, and	2,4		
+		2,4-Dinitrophenol	2,4		
		2,4-Dinitrotoluene	2,4		
	122667	1,2-Diphenylhydrazine	2,4		
		Epichlorohydrin (I-Chloro	2,4		
			0.4		
	106887	1,2-Epoxybutane	2,4		
	106887 140885	1,2-Epoxybutane Ethyl acrylate	2,4		
	106887 140885 100414	1,2-Epoxybutane	2,4		
	106887 140885 100414 51796 75003	1,2-Epoxybutane Ethyl acrylate Ethyl benzene Ethyl carbamate (Uretha Ethyl chloride (Chloroeth	2,4 2,4 2,4		
x	106887 140885 100414 51796 75003 106934	1,2-Epoxybutane Ethyl acrylate Ethyl benzene Ethyl carbamate (Uretha	2,4 2,4 2,4 2,4	EPA TO-14/CARB 422	

HAPS Selection and Test Methods for Source Category					
Source Catego	rrv:	Boilers (digester gas fire	4/		
Source Catego	ıy.	bollers (digester gas file	u)		
Include in List		Chemical name	If excluded, give reason for exclusion (use codes where appropriate)	If Included, give applicable test method(s)	
		Ethylene glycol Ethylene imine (Aziridine	2,4		
		Ethylene oxide	2,4		
		Ethylene thiourea	2,4		
		Ethylidene dichloride (1,	2,4	CARR 420	
X		Formaldehyde Heptachlor	2,4	CARB 430	
			2,4		
			2,4		
		Hexachlorocyclopentadie Hexachloroethane	2,4		
		Hexamethylene-1,6-diiso			
	680319	Hexamethylphosphoram	2,4		
		Hexane	2,4		
		Hydrazine Hydrochloric acid	2,4		
		Hydrogen fluoride (Hydro			
	7783064	Hydrogen sulfide	2,4		
		Hydroquinone Isophorone	2,4		
		Lindane (all isomers)	2,4		
	108316	Maleic anhydride	2,4		
		Methanol	2,4		
	72435	Methoxychlor Methyl bromide (Bromon	2,4		
		Methyl chloride (Chloron			
Х	71556	Methyl chloroform (1,1,1	-Trichloroethane)	EPA TO-14/CARB 422	
		Methyl ethyl ketone (2-B			
		Methyl hydrazine Methyl iodide (lodometha	2,4		
		Methyl isobutyl ketone (F			
			2,4		
		Methyl methacrylate Methyl tert butyl ether	2,4		
		4,4-Methylene bis(2-chlo			
х		Methylene chloride (Dich		EPA TO-14/CARB 422	
		Methylene diphenyl diiso			
		4,4Methylenedianiline Naphthalene	2,4		
		Nitrobenzene	2,4		
		4-Nitrobiphenyl	2,4		
		4-Nitrophenol 2-Nitropropane	2,4 2,4		
			2,4		
	62759	N-Nitrosodimethylamine	2,4		
		N-Nitrosomorpholine	2,4		
		Parathion Pentachloronitrobenzene	1,2,4		
			2,4		
	108952		2,4		
		p-Phenylenediamine Phosgene	2,4		
			2,4		
	7723140	Phosphorus	2,4		
			2,4		
		Polychlorinated biphenyl 1,3-Propane sultone	2,4		
	57578	beta-Propiolactone	2,4		
			2,4		
		Propoxur (Baygon) Propylene dichloride (1,2	1,2,4		
		Propylene oxide	2,4		
	75558	1,2-Propylenimine (2-Me	2,4		
	91225	Quinoline	2,4		
		Quinone Styrene oxide	2,4 2,4		
		2,3,7,8-Tetrachlorodiben			
х	127184	Tetrachloroethylene (Per	2,4	EPA TO-14/CARB 422	
v		Titanium tetrachloride	1,2,4	EDA TO 14/CARR 422	
X		Styrene Toluene		EPA TO-14/CARB 422 EPA TO-14/CARB 422	
		2,4-Toluene diamine	2,4		
		2,4-Toluene diisocyanate			
		o-Toluidine Toxaphene (chlorinated	2,4		
		1,2,4-Trichlorobenzene	2,4		
	79005	1,1,2-Trichloroethane	2,4		
Х		Trichloroethylene	24	EPA TO-14/CARB 422	
			2,4 2,4		
	00002	2,4,0-111011010pnen01	۷, ۲		

HAPS Selection	n and Test N	lethods for Source Cated	orv		
Source Catego	ry:	Boilers (digester gas fire	d)		
		(0 0			
Include in List	CAS No.	Chemical name	If excluded, give reason for exclusion (use codes where appropriate)	If Included, give applicable test method(s)	
	121448	Triethylamine	2,4		
	1582098	Trifluralin	1,2,4		
	540841	2,2,4-Trimethylpentane	2,4		
		Vinyl acetate	2		
	593602	Vinyl bromide	2,4		
Х		Vinyl chloride		EPA TO-14/CARB 422	
Х		Vinylidene chloride (1,1-l		EPA TO-14/CARB 422	
Х		Xylenes (isomers and mi	xture	EPA TO-14/CARB 422	
Х	95476	o-Xylenes		EPA TO-14/CARB 422	
Х	108383	m-Xylenes		EPA TO-14/CARB 422	
х		p-Xylenes		EPA TO-14/CARB 422	
	N/A	Antimony Compounds	1,2,4		
	N/A	Arsenic Compounds (inc			
	N/A	Beryllium Compounds	1,2,4		
	N/A	Cadmium Compounds	1,2,4		
	N/A	Chromium Compounds			
	N/A	Cobalt Compounds	1,2,4		
	N/A	Coke Oven Emissions	1,2,4		
	N/A	Cyanide Compounds *1			
	N/A	Glycol ethers *2	1,2,4		
	N/A	Lead Compounds	1,2,4		
	N/A	Manganese Compounds			
	N/A	Mercury Compounds	1,2,4		
	N/A		2,4		
	N/A	Nickel Compounds	1,2,4		
	N/A	Polycylic Organic Matter			
	N/A	Radionuclides (including			
	N/A	Selenium Compounds	1,2,4		